

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

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<b>UNITED STATES OF AMERICA</b>	§	
	§	
<b>v.</b>	§	<b>3:09-CR-145-N</b>
	§	
<b>KENYA THOMAS</b>	§	

**FACTUAL RESUME**

The Defendant, Kenya Thomas; her attorney, Douglas A. Morris; and the United States of America agree to the law and facts as follows:

**ELEMENTS OF THE OFFENSE**

Conspiracy to Transport Individuals for Prostitution  
[Violation of 18 U.S.C. § 371 (18 U.S.C. § 2421)]

In order to prove the offense of Conspiracy to Transport Individuals for Prostitution, as alleged in Count One of the Indictment, the government must prove each of the following elements beyond a reasonable doubt:

- First:* That the Defendant and at least one other person made an agreement to commit the crime of transportation for prostitution, as charged in the Indictment;
- Second:* That the Defendant knew the unlawful purpose of the agreement and joined in it willfully, that is, with the intent to further the unlawful purpose; and
- Third:* That one of the conspirators during the existence of the conspiracy knowingly committed at least one of the overt acts described in the Indictment, in order to accomplish some object or purpose of the conspiracy.

### **STIPULATED FACTS**

MARCUS CHOICE WILLIAMS held himself out to be a “pimp” in the prostitution “game” and that he, THOMAS, and PRESTON PETTIT directly and/or indirectly transported, or aided and abetted the transportation of, individuals within interstate commerce. WILLIAMS advertised prostitution services on the Internet at [www.PrivateBash.com](http://www.PrivateBash.com), offering services within the “Boston-DC-Dallas” areas. At all times relevant to the Indictment, THOMAS, the mother of two of WILLIAMS’ five children, acted as WILLIAMS’ “bottom” –the prostitute most responsible for assisting a pimp with the management of his operation. THOMAS assisted WILLIAMS in the recruitment of new girls, monitoring-answering-referring solicitations from the web-sites, and deposited money on WILLIAMS’ behalf. THOMAS was especially helpful to WILLIAMS in securing girls who were either new or initially resistant to prostitution. She told them the rules of working for WILLIAMS, gave them advice, and generally acted as a mentor/supervisor to new girls. Moreover, THOMAS was present at the home when WILLIAMS violently assaulted Flores and Dominguez during his efforts to force them to prostitute on his behalf.

On numerous occasions, WILLIAMS and THOMAS worked together to transport young women within interstate commerce for the purpose of prostitution. Moreover, WILLIAMS directed the young women to forwarding their daily earnings in the form of wire transfers and money orders that were deposited into a bank account opened in the name of “Redd2Salon.”

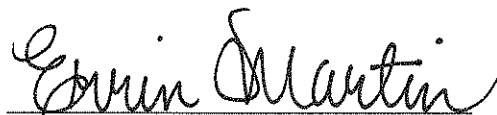
In furtherance of the conspiracy, THOMAS committed the following overt acts:

- 1) On or about December 7, 2006, and on or about December 18, 2006, Defendant THOMAS rented rooms at the Dupont Hotel in Washington, D.C.
- 2) On or about December 8, 2006, through December 10, 2006, Defendant THOMAS rented a room at the Jury's Washington Hotel.
- 3) On or about December 12, 2006, through on or about December 15, 2006, and on or about July 9, 2007, through on or about July 18, 2007, Defendant THOMAS rented rooms at the Courtyard Marriott Hotel in Washington, D.C.
- 4) On or about March 26, 2007, Defendant THOMAS rented a room at the St. Gregory Hotel in Washington, D.C.
- 5) On or about July 23, 2007, at approximately 2:05 a.m., Defendant THOMAS posted a \$100 bond to secure the release of "Jennifer London," who had been arrested by the District of Columbia Metropolitan Police Department.
- 6) On or about August 14, 2007, while THOMAS was present in the home with WILLIAMS, PETTIT, and "Jennifer London", Defendant WILLIAMS verbally, physically, and sexually assaulted "Jennifer London."
- 7) On or about August 15, 2007, Defendants THOMAS and PETITT removed computers and various storage media from 3046 Morning Star Drive, Little Elm, Texas.

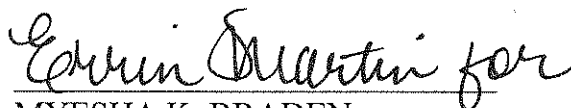
As alleged in Count One of the Indictment, THOMAS admits that she did intentionally and knowingly combine, conspire, confederate, and agree together and with WILLIAMS and PETTIT, and with others known and unknown, to transport individuals for the purpose of prostitution.

Agreed to and signed this 6<sup>th</sup> day of November, 2009.

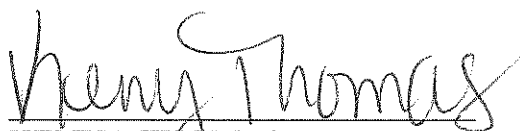
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Defendant



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